

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
NORTHERN DIVISION**

LEE HARTWELL,	)	Case No.: 2:06-CV-518
	)	
Plaintiff,	)	<b>CITY OF MONTGOMERY’S and KELLY</b>
	)	<b>GORDON’S REQUESTED <i>VOIRE DIRE</i></b>
vs.	)	
THE CITY OF MONTGOMERY and THE	)	
PERSONNEL BOARD FOR THE CITY AND	)	
COUNTY OF MONTGOMERY, and KELLY	)	
GORDON	)	
	)	
Defendants.	)	
	)	
	)	

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COME NOW the City of Montgomery and Kelly Gordon, Defendants in the above-styled action, by and through undersigned counsel, and request that the following questions be asked of the jury panel prior to jury selection in the above case.

1. Has anybody ever filed a claim for damages against a municipality or county? If so, against which city or county did you file it, and what did you claim damages for?
  2. Does anybody belong to any organization or movement which advocates the abolition of civil authority, or the removal of governmental restraints, or which advocates a theory of “self-ownership”?
  3. Has any member of the panel ever been demoted from a position or fired from a job? If so, by which employer and for what reason?
  4. Has any member of the panel ever received a less-than-satisfactory job performance evaluation? If so, state whether you received any loss of pay, loss of promotion, or other discipline.
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Respectfully submitted.

/s/ Wallace D. Mills  
Wallace D. Mills (MIL 090),  
Attorney for the City of Montgomery

OF COUNSEL:  
City of Montgomery Attorney's Office  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of April, 2007, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

J. Bernard Brannan, Jr., Esq.  
P.O. Box 307  
Montgomery, AL 36101

Robert D. Segal  
Copeland, Franco, Screws & Gill, P.A.  
P.O. Box 347  
Montgomery, AL 36101-0347

and I hereby certify that I have also mailed by United States Postal Service the document to the above-named non-CM/ECF participants:

/s/ Wallace D. Mills  
OF COUNSEL